

Help for Today... Hope for Tomorrow



BOARD MEMBERS

Bishop Stephen E. Blaire President

> John M. Solis **Board Chair** SJ Work Net **Executive Director**

Msgr. John Armistead, S.T.L. Cathedral of the Annunciation,

Vice Chair Pastor

> John Curtis, CPA Treasurer Boss Deller and Co.

> > Dr.Elmano Costa Secretary CSU, Stanislaus

Don Geiger Attorney at Law Kroloff, Belcher, Smart, Perry, & Christpherson

John Souza Retired Teamsters Labor Representative

Perfecto Munoz MA,PH.D,MPH Senior Policy Advisor UC Berkeley, School of Public Health

Dillon Delvo, MA **Executive Director** Little Manila Foundation

Gregory Oliver Attorney **Gregory Oliver Law Offices** Mi Wuk Village

> Elvira Ramirez Executive Director

January 28, 2016

The Honorable Felicia Marcus, Chair and Members of the State Water Resources Control Board c/o Jeanine Townsend, Clerk to the Board State Water Resources Control Board 10001 I Street, 24th Floor Sacramento, CA 95814

Via e-mail to: Kathy.Frevert@waterboards.ca.gov

Re: Comments on Proposed Extended Emergency Conservation Regulation for Urban Water Conservation

Dear Chair Marcus and Members of the Board:

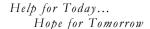
The Environmental Justice Program at Catholic Charities, Diocese of Stockton applauds the State Water Resources Control Board and this Administration for your handling of the drought emergency over the past two years. Through your Emergency Conservation Regulation, you have achieved an unprecedented level of public awareness of the urgent need to reduce water waste. The result has been a remarkable level of water savings that has achieved Governor Brown's goal of reducing urban water use statewide by at least 25%.

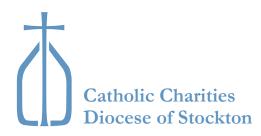
The Environmental Justice Program is writing to support the Board's development and adoption of a permanent conservation regulation and water use reporting requirement for the State that will build upon these achievements. We believe that a permanent regulation is essential to help the State better prepare for the next drought, and is vital to ensuring that the State is eliminating wasteful water practices that reduce the State's ability to cope with climate change.

However, we are aware of the concerns raised by some water agencies and districts about the equity and sustainability of the water savings "percentage target reduction" methodology employed in the current emergency regulation.

The Environmental Justice Program supports the approached outlined by the Inland Empire Utilities Agency, Moulton Nigel Water District, Las Virgines Water District, Southern California Water Committee and others that the permanent regulation be based on performance-based water efficiency standards that the State has already adopted through SBX7-7 (55 GPCD indoor water use) and the Model Water Efficient Landscape







BOARD MEMBERS

Bishop Stephen E. Blaire **President**

> John M. Solis **Board Chair** SJ Work Net Executive Director

Msgr. John Armistead, S.T.L. Vice Chair Cathedral of the Annunciation, Pastor

John Curtis, CPA *Treasurer* Boss Deller and Co.

Dr.Elmano Costa **Secretary** CSU, Stanislaus

Don Geiger Attorney at Law Kroloff,Belcher,Smart, Perry, & Christpherson

John Souza Retired Teamsters Labor Representative

Perfecto Munoz MA,PH.D,MPH Senior Policy Advisor UC Berkeley, School of Public Health

Dillon Delvo, MA Executive Director Little Manila Foundation

Gregory Oliver Attorney Gregory Oliver Law Offices Mi Wuk Village

> Elvira Ramirez Executive Director

Ordinance (as updated by the Department of Water Resources in July 2015), for residential and non-residential irrigation.

The benefits of using the existing State water efficiency standards as the basis for the permanent conservation regulation include:

- 1. The methodology is fair, simple, and clear. It provides the State with a *single* water management tool where efficiency targets can be ratcheted up or down as needed to respond to future droughts or the impacts of climate change.
- 2. It ensures that the State's existing water efficiency standards, such as Department of Water Resources' updated model water efficient landscape ordinance, are implemented, not ignored.
- 3. It also helps to assure that the statewide water efficiency gains that have been achieved under the emergency conservation regulations are not lost.

The Environmental Justice Program believes that State adoption of a permanent conservation regulation is absolutely necessary to prepare California not only for the next drought but also for the impacts of climate change on the State's water supplies. We further believe that use of a methodology that is based on the State's existing water efficiency performance-based standards will result in a meaningful permanent reduction in wasteful water use.

Sincerely,

Katelyn Roedner Sutter

Environmental Justice Program Director

RoednerSutter

